

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 05-30074-MAP

TAMMY WALKER,)
Plaintiff)
)
v.)
)
CITY OF HOLYOKE,)
Defendant)

**DEFENDANT'S MOTION FOR LEAVE TO FILE MEMORANDUM IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT IN EXCESS OF 20 PAGES**

Now comes the defendant, City of Holyoke (the "City"), and moves this honorable Court for leave to file a memorandum in support of its motion for summary judgment in excess of twenty (20) pages pursuant to *Local Rule 7.1(B)(4)*.

In support of this motion, the City states that this case involves a fifteen (15) count complaint by a former sergeant with the City's Police Department alleging discrimination based on gender (female), race (African-American) and sexual orientation (lesbian); creation of a hostile work environment based on race, gender and sexual orientation; retaliation and violation of the Massachusetts Whistleblower statute. *M.G.L. c. 151B, § 4; Title VII (42 U.S.C. § 2000e et seq.)*; *M.G.L. c. 149, § 185; 42 U.S.C. § 1981*; and *42 U.S.C., § 1983*. Furthermore, the underlying factual allegations of this case span a period of time from 1999 to 2005 and involve numerous incidents upon which the plaintiff bases her complaint.

In order to properly address both the underlying undisputed facts and the pertinent legal arguments on summary judgment, it is necessary to prepare a supporting memorandum in excess of twenty (20) pages.

WHEREFORE, the defendant, City of Holyoke, respectfully requests that this Court allow it to file a memorandum of law in support of its motion for summary judgment in excess of twenty (20) pages.

LOCAL RULE 7.1 CERTIFICATION

On May 9, 2007, defendant's counsel, Carole Sakowski Lynch, conferred with plaintiff's counsel, Ozell Hudson, Jr., who indicated that he will not assent to the defendant's motion for leave to file memorandum in support of motion for summary judgment in excess of twenty (20) pages because he does not have his client's authorization to do so.

The Defendant,
CITY OF HOLYOKE,

By Its Attorneys
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I hereby certify that this document, filed through the ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on May 18, 2007.

/s/ Carole Sakowski Lynch